

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)
)
Request for Additional Information)
Regarding the Rate Integration Plan) CC Docket No. 96-61
Filed by the American Samoa)
Telecommunications Authority)
)

REPLY COMMENTS OF VERIZON¹

The Commission should grant carriers at least 12 months to implement any requirement to provide rate-integrated interexchange service to American Samoa.

Verizon agrees with AT&T that implementing rate integration for American Samoa will require significant changes to several different billing and other systems and that such modifications will take at least 12 months to complete. *See* AT&T Comments at 1-2.

In order to provide rate-integrated service to American Samoa, Verizon will be required to make numerous changes to five billing systems: Verizon's "Customer Record Information Systems" for New York, New Jersey/Pennsylvania/Delaware, and New England serving areas; Verizon's "Customer Billing Services System;" and Verizon's "National Business Billing System." Specifically, Verizon will have to update rate tables in these billing systems and also perform "hard coding" so that current calling plans accurately reflect usage as a result of the rate changes. Making the required modifications over a minimum of 12 months will allow Verizon to efficiently implement

¹ The Verizon companies ("Verizon") are the affiliated long distance telephone companies of Verizon Communications Inc. These companies are listed in Attachment A.

any integrated-rate service requirements and also test the modified systems to ensure that they function properly.

An implementation period of at least 12 months is also consistent with the Commission's *Rate Averaging/Integration Order*. 11 FCC Rcd 9564 ¶ 73 (1996). There, the Commission allowed carriers 12 months to achieve rate integration to certain offshore points. Verizon agrees with AT&T that it will take at least that long to implement any rate integration requirement for American Samoa. *See* AT&T Comments at 2.

For the foregoing reasons, the Commission should grant carriers a minimum of 12 months to comply with any Commission requirement to provide rate-integration service to American Samoa.

Respectfully submitted,

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THE VERIZON COMPANIES

For the purposes of this filing the Verizon companies are the following entities affiliated with Verizon Communications Inc.:

Bell Atlantic Communications, Inc. d/b/a Verizon Long Distance
MCI Communications Services, Inc. d/b/a Verizon Business Services
MCImetro Access Transmission Services LLC d/b/a Verizon
Access Transmission Services
MCImetro Access Transmission Services of Massachusetts, Inc. d/b/a
Verizon Access Transmission Services of Massachusetts
MCImetro Access Transmission Services of Virginia, Inc. d/b/a Verizon
Access Transmission Services of Virginia
MCI International, Inc.
MCI International Services, Inc.
MCI Network Services of Virginia, Inc.
Metropolitan Fiber Systems of New York, Inc.
NYNEX Long Distance Company d/b/a Verizon Enterprise Solutions
Teleconnect Long Distance Services and Systems Company
TTI National, Inc.
Verizon Select Services Inc.

On Jan. 6, 2006, MCI, Inc. merged into MCI, LLC, a wholly owned subsidiary of Verizon Communications Inc. Those MCI business units and certain other Verizon business units that serve enterprise and government customers now call themselves Verizon Business; those MCI business units serving consumer residential and small business customers continue to operate using the name MCI.